

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1. SANDY GONZALEZ DOMINGUEZ,)	
)	
Plaintiff)	
)	Case No. 13-CV-379-JHP-PJC
v.)	Honorable James H. Payne
)	
1. WEBCO INDUSTRIES, INC., an)	
Oklahoma Corporation,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441(a) and 1446, Webco Industries, Inc. (“Defendant”) hereby gives notice of the removal of the proceeding captioned “*Sandy Gonzalez Dominguez v. Webco Industries, Inc.*” bearing Case No. CJ-2013-02399 on the docket of the District Court of Tulsa County, Oklahoma, to the United States District Court for the Northern District of Oklahoma. In support of this Notice of Removal, Defendant respectfully shows the Court as follows:

1. On or about May 16, 2013, Plaintiff commenced an action in the District Court for Tulsa County against Defendant. The two claims in Plaintiff’s Petition (“Petition”) seek judgment against Defendant for alleged violations of the Workers’ Compensation Code of the State of Oklahoma and the Family and Medical Leave Act of 1993. Service of process occurred on or about May 31, 2013. A copy of the Petition is included as “Exhibit A” to Defendant’s Appendix to Removal, filed contemporaneously herewith.

2. The basis for removal to this Court is federal question jurisdiction pursuant to 28 U.S.C. § 1331. Accordingly, this case may be removed pursuant to the provisions of 28 U.S.C. § 1441.

3. This Notice of Removal is filed within the time permitted by 28 U.S.C. § 1446(b).

4. The Northern District of Oklahoma is the federal district that embraces the District Court of Tulsa County, Oklahoma. Therefore, removal to the United States District Court for the Northern District of Oklahoma is proper.

5. Pursuant to LCvR81.2, copies of all pleadings filed in the District Court of Tulsa County, Oklahoma, and a copy of the docket sheet of the case, shall be filed concurrently with Defendant's Notice of Removal. A copy of all pleadings and a copy of the docket sheet are included in Defendant's Appendix to Removal, filed contemporaneously herewith.

6. A Notice of Filing of Notice of Removal, a copy of which is included in Defendant's Appendix to Removal, will be filed in the District Court of Tulsa County, Oklahoma as soon as this Notice of Removal has been filed in this Court.

WHEREFORE, Defendant respectfully requests that the matter of *Sandy Gonzalez Dominguez*, Case No. CJ-2013-02399, pending in the District Court of Tulsa County, Oklahoma, be removed to this Court.

Respectfully Submitted,

STRECKER & ASSOCIATES, P.C.

/s/ Sean W. Kilian

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of June 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following person:

Brendan M. McHugh, OBA # 18422
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ATTORNEY FOR PLAINTIFF

/s/ Sean W. Kilian

Sean W. Kilian